

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Ramon Moreno, Donald O'Halloran, Omkharan Arasaratnam, Baiju Gajjar, and Rajath Nagaraja, individually and as representatives of a class of similarly situated persons, and on behalf of the Deutsche Bank Matched Savings Plan,

Plaintiffs,

v.

Deutsche Bank Americas Holding Corp., Deutsche Bank Matched Savings Plan Investment Committee, Deutsche Bank Americas Holding Corp. Executive Committee, Richard O'Connell, John Arvanitis, Robert Dibble, Tim Dowling, Richard Ferguson, James Gnall, Louis Jaffe, Patrick McKenna, David Pearson, Joseph Rice, Scott Simon, Andrew Threadgold, and James Volkwein,

Defendants.

Case No. 1:15-cv-09936 (LGS)

**PLAINTIFFS' NOTICE OF
MOTION AND MOTION
FOR APPROVAL OF
ATTORNEYS' FEES,
EXPENSES AND SERVICE
AWARDS**

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on February 28, 2019, before the Honorable Lorna G. Schofield, United States District Judge, in Courtroom 1106 of the Thurgood Marshall United States Courthouse, located at 40 Foley Square, New York, New York, 10007, Plaintiffs Ramon Moreno, Donald O'Halloran, Omkharan Arasaratnam, Baiju Gajjar, and Rajath Nagaraja ("Plaintiffs") will and hereby do move this Court for an Order awarding: (1) attorneys' fees in the amount of \$6,570,000 (thirty percent of the Settlement Fund); (2) reimbursement of \$759,779.30 in expenses that Class Counsel incurred in connection with this action; (3) settlement administration expenses in the amount of \$106,536 (including \$64,036 to the Settlement Administrator; \$2,500 to the Escrow Agent, and \$40,000 to the Independent Fiduciary retained in connection with Article 3 of the Settlement); and (4) service awards in the amount of \$10,000 to each of the named Plaintiffs.

This motion is made pursuant to Federal Rule of Civil Procedure 23(h) and Article 8 of the Parties' Class Action Settlement Agreement (ECF No. 322-1), and is based on the accompanying Memorandum of Law and authorities cited therein, the Declaration of Kai Richter and exhibits attached thereto, the previously-filed declarations of the Class Representatives (ECF Nos. 323 through 327), the Settlement Agreement, and all files, records, and proceedings in this matter.

Counsel for Plaintiffs have conferred with counsel for Defendants regarding this motion and have been advised that Defendants do not oppose the motion as parties to the Settlement.

Dated: December 18, 2018

Respectfully Submitted,

NICHOLS KASTER, PLLP

/s/ Kai H. Richter
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Attorneys for Plaintiffs and the Class

CERTIFICATE OF SERVICE

I hereby certify that on December 18, 2018, a true and correct copy of Plaintiffs' Notice of Motion and Motion for Approval of Attorneys' Fees, Expenses and Service Awards was served by CM/ECF to the parties registered to the Court's CM/ECF system.

Dated: December 18, 2018

/s/ Kai H. Richter
Kai H. Richter